

**WHITEFORD, TAYLOR & PRESTON LLC**

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*Smucker Retail Food Inc. and*

*Ainsworth Pet Nutrition LLC*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**In re:**

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**SEARS HOLDING CORPORATION, *et al.*,**

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**Case No.: 18-23538-RDD  
(Jointly administered)**

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**Debtors.**

**(Chapter 11)**

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**NOTICE OF RECLAMATION DEMAND OF  
AINSWORTH PET NUTRITION LLC**

PLEASE TAKE NOTICE that, by and through its undersigned counsel, Ainsworth Pet Nutrition LLC (“APN”) hereby files this notice of delivery of a written demand, pursuant to §§ 503 and 546 of title 11 of the United States Code, and applicable non-bankruptcy law on the above-captioned debtors and debtors-in-possession (the “Debtors”) to reclaim certain assets (the “Goods”) that are subject to reclamation. The Goods were sold in the ordinary course of APN’s business and delivered on credit terms to, and received by, the Debtors during the 45 days prior to the filing of the Debtors’ bankruptcy petitions. APN believes that the Debtors were insolvent at the time they received delivery of the Goods. APN attaches as **Exhibit A** and incorporates by reference herein, a copy of its formal reclamation demand letter delivered to the

Debtors on October 31, 2018. APN hereby reserves all other rights and interests with respect to the Goods.

Date: October 31, 2018

/s/ Stephen B. Gerald  
Stephen B. Gerald (*pro hac vice* admission  
pending)  
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